

Timeline of Discovery Efforts

Parties agreed to Mar 2023 trial date	July 2, 2021
Parties held Rule 26 conference	July 23, 2021
Parties Rule 26 report filed (ECF 55)	Aug 13, 2021
BAE & Fluor served Initial Disclosures	Sep 13, 2021
Parties filed Joint Amended Scheduling Order (ECF 57-1)	Sep 24, 2021
Parties filed Joint ESI Protocol (ECF 59)	Oct 4, 2021
BAE & Fluor exchanged Hub e-mail custodians	Oct 11, 2021
Fluor served Interrogatories and Requests for Production of Documents on BAE.	Oct 15, 2021
BAE & Fluor identified Party e-mail custodians	Oct 18, 2021
BAE & Fluor identified noncustodial records location	Oct 19, 2021
Fluor provided BAE with a proposed Protective Order	Oct 19, 2021
Fluor provided BAE with proposed search terms for doc production	Oct 22, 2021
Fluor served notice of intent and subpoena to Lauren	Nov 9, 2021
Fluor contacted BAE requesting BOWAS contact	Nov 9, 2021
Fluor contacted BOWAS requesting contact info	Nov 12, 2021
BAE objects to Fluor Discovery and fails to Answer	Nov 15, 2021

EXHIBIT**A**